Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests modification of Section 74.1201 to reflect that the Fill-in area for an AM station's FM translator service is the AM 1mV contour.

This section states *"(j) AM Fill-in area. The area within the greater of the 2 mV/m daytime contour of the AM radio broadcast station being rebroadcast or a 25-mile (40 km) radius centered at the AM transmitter site".* TTS proposes that the fill-in area for AM be set to match that of FM fill in area definitions. FM station fill-in area is the FCC 60dBu (50,50) contour, also equivalent to a field value of 1.0mV/m. AM stations should be permitted to utilize the same definition of fill-in as companion FM services.

This change will permit AM stations to better serve listeners in their 1 mv/m contour whose AM signal suffers from atmospheric and man-made noise and is would be consistent with FM classes of stations which specify 1 mv/m.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services